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*Attorneys for Defendants Zuffa, LLC and
Endeavor Group Holdings, Inc.*

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

KAJAN JOHNSON and CLARENCE
DOLLAWAY, on behalf of themselves and all
others similarly situated

Plaintiffs,

v.

ZUFFA, LLC (d/b/a Ultimate Fighting
Championship and UFC) and ENDEAVOR
GROUP HOLDINGS, INC.,

Defendants.

Civil Case No.: 2:21-cv-01189-RFB-BNW

**STIPULATION AND [PROPOSED]
ORDER EXTENDING DEADLINE TO
FILE JOINT DISCOVERY PLAN**

(Second Request)

1 Plaintiffs Kajan Johnson and Clarence Dollaway, by and through their counsel of record, and
2 Defendants Zuffa, LLC and Endeavor Group Holdings, Inc., by and through their counsel of record,
3 hereby stipulate to extend the time in which the parties must file a Joint Discovery Plan/Scheduling
4 Order. *See* ECF No. 40. This is the parties' second request for an extension of this deadline.

5 On September 10, 2021, Defendants filed and served a Motion to Dismiss the Class Action
6 Complaint, which became ripe for review on November 18, 2021. ECF Nos. 17, 41, 48. While briefing
7 the motion to dismiss, the parties requested an extension of time to file the joint discovery plan and
8 scheduling order, ECF No. 39, which the Court granted on October 22, 2021, ECF No. 40.

9 The parties' deadline to file a joint discovery plan and scheduling order is currently set for
10 December 24, 2021, which is a court holiday. ECF No. 40. The parties have begun to discuss the issues
11 required by Federal Rule of Civil Procedure 26(f), but need to resolve outstanding issues. The parties
12 have agreed to a 21-day extension to file the joint discovery plan. Under this stipulation, the joint
13 discovery plan and scheduling order will be due on January 14, 2022.

14
15 **ORDER**

16 **IT IS SO ORDERED**

17 **DATED:** 10:10 am, December 27, 2021

18 

19 **BRENDA WEKSLER**
20 **UNITED STATES MAGISTRATE JUDGE**
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December 21, 2021

Respectfully submitted,

BERGER MONTAGUE PC

By: /s/ Eric L. Cramer

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20 December 21, 2021

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